

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

LTL MANAGEMENT LLC,
Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,
Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No.: 23-01092 (MBK)

DEBTOR'S EXHIBIT LIST

LTL Management LLC, the above-captioned debtor (the “Debtor”), identifies below the exhibits it is offering into evidence in connection with the hearing on the *Debtor’s Motion for an Order (I) Declaring That the Automatic Stay Applies or Extends to Certain Actions against*

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting a Temporary Restraining Order Ex Parte Pending a Hearing on a Preliminary Injunction [Adv. Dkt. 2].

The Debtor incorporates by reference all exhibits that were admitted into evidence at the hearing on (a) the *Motion of the Official Committee of Talc Claimants to Dismiss Debtor’s Chapter 11 Case* [No. 21-30589, Dkt. 632] and (b) the *Motion to Dismiss Bankruptcy Case* filed by Arnold & Itkin LLP [No. 21-30589, Dkt. 766], in the case In re LTL Management LLC, No. 21-30589 (MBK), pursuant to the *Joint Stipulation and Agreed Order Between Movants and Debtor Regarding the Admission of Exhibits at Motion to Dismiss Trial* entered on February 16, 2022 [No. 21-30589, Dkt. 1497].

In addition, the Debtor identifies the following exhibits:

Ex.	Description	Beg. Bates No.	Confidential ² Designation
Declaration of John Kim and Exhibits			
1.	Declaration of John K. Kim in Support of First Day Pleadings, Case No. 23-12825 (“Kim Decl.”), including all exhibits thereto:	LTLMGMT-00000020	
	Annex A to Kim Decl., 1979 Agreement		
	Annex B to Kim Decl., Debtor’s Corporate Structure Chart		
	Annex C to Kim Decl., Form Plan Support Agreement		
	Annex D to Kim Decl., Termination and Substitution Agreement		
	Annex E to Kim Decl., 2023 Funding Agreement		
	Annex F to Kim Decl., J&J Support Agreement		
	Annex G to Kim Decl., March 6, 2023 Letter from Trailblazers		
	Annex H to Kim Decl., March 21, 2023 Letter from Trailblazers’ Counsel		

² The Debtor’s listing of an exhibit does not waive the Debtor’s confidentiality designation for any exhibit previously so marked.

Ex.	Description	Beg. Bates No.	Confidential ² Designation
	Annex I to Kim Decl., Plaintiff's Response to Defendants' Opposition to Trailblazer Studios' Request to Record Trial Proceedings		
Plan Support Agreements and Term Sheet			
2.	Plan Support Agreement with Kiesel Law LLP	LTLMGMT-00000914	Confidential
3.	Plan Support Agreement with Seeger Weiss LLP	LTLMGMT-00001531	Confidential
4.	Plan Support Agreement with OnderLaw, LLC with claimant list (former TCC member)	LTLMGMT-00002785	Confidential
5.	Plan Support Agreement with Johnson Law Group with claimant list	LTLMGMT-00003371	Confidential
6.	Plan Support Agreement with Ferrer Poirot Wansbrough with claimant list	LTLMGMT-00003444	Confidential
7.	Plan Support Agreement with Liakos Law, APC with claimant list	LTLMGMT-00003462	Confidential
8.	Plan Support Agreement with Linville Law Group with claimant list	LTLMGMT-00003480	Confidential
9.	Plan Support Agreement with Nachawati Law with claimant list (former TCC member)	LTLMGMT-00003498	Confidential
10.	Plan Support Agreement with McDonald Worley PC with claimant list	LTLMGMT-00003647	Confidential
11.	Plan Support Agreement with Pulaski Kherkher with claimant list	LTLMGMT-00003685	Confidential
12.	Plan Support Agreement with Slater Slater Schulman LLP with claimant list	LTLMGMT-00003882	Confidential
13.	Plan Support Agreement with Rueb Stoller Daniel, LLP with claimant list	LTLMGMT-00003921	Confidential
14.	Plan Support Agreement with Trammell PC with claimant list	LTLMGMT-00003959	Confidential
15.	Plan Support Agreement with Wisner Baum, LLP with claimant list	LTLMGMT-00004005	Confidential
16.	Plan Support Agreement with Watts Guerra LLC with claimant list	LTLMGMT-00004025	Confidential
17.	Plan Support Agreement with Andres Pereira Firm with claimant list	LTLMGMT-00004956	Confidential
18.	Signature page of Robinson Calcagnie DocuSign Envelope ID: C316F0C6-FFD0-4BFE-904E-0C3D7CB2235C	LTLMGMT-00000272	Confidential
19.	Term Sheet – HIGHLY CONFIDENTIAL	LTLMGMT-00002628	Highly Confidential
Board Minutes and Presentations			

Ex.	Description	Beg. Bates No.	Confidential ² Designation
20.	Minutes of Board of Managers LTL Management LLC (March 16, 2023)	LTLMGMT-00002626	Confidential
21.	Minutes of Board of Managers LTL Management LLC (March 28, 2023)	LTLMGMT-00000001	Confidential
22.	Minutes of Board of Managers LTL Management LLC (April 2, 2023)	LTLMGMT-00000006	Confidential
23.	Presentation to Board of Managers of LTL Management LLC (March 28, 2023)	LTLMGMT-00002641	Confidential
24.	Presentation to Board of Managers of LTL Management LLC (April 2, 2023)	LTLMGMT-00002668	Confidential
Non-Disclosure Agreements			
25.	Template non-executed NDA	LTLMGMT-00002680	Confidential
Organizational Structure			
26.	2022 Group Holdings	LTLMGMT-00000192	Confidential
27.	Johnson & Johnson Holdco (NA) Inc. (US –6101) (“Old JJCI”) Structure Chart	LTLMGMT-00000194	Confidential
Valadez-Related Materials			
28.	Emory Hernandez Facebook Profile		
29.	Emory Hernandez Facebook Post (Feb. 27, 2023)		
30.	Plaintiff’s Notices of Deposition for Person(s) Most Qualified, Reyes (July 15, 2020)		
31.	Plaintiff’s Notices of Deposition for Person(s) Most Qualified, Vanklive (Nov. 24, 2020)		
32.	Plaintiff’s Notices of Deposition for Person(s) Most Qualified, Prudencio (Dec. 8, 2020)		
33.	2022.02.04 Stanford Adv. Med. Center Roy Thoracic Oncology f-u		Confidential
34.	2022.02.11 Stanford Adv. Med. Center Telephone Encounters re High Heart Rate, ED Referral		Confidential
35.	2022.03.04 Stanford Adv. Med Center Roy Diagnosis of Pericardium Primary Mesothelioma		Confidential
36.	2022.03.18 Stanford Adv. Med Center Roy Progress Notes & Infusion Reaction		Confidential
37.	2022.04.09 - 2022.04.10 Stanford Hospital Antineoplastic Chemotherapy		Confidential
38.	2022.08.03 Stanford Tooth Pain Phone Call, Rescheduling, Med Refill Reports		Confidential
39.	2022.08.08 Stanford Cancer Genetics, Treatment, Med Refill Reports		Confidential

Ex.	Description	Beg. Bates No.	Confidential ² Designation
40.	Transcript of Deposition of Barry R. Horn, M.D., <i>Valadez v. Johnson & Johnson et al.</i> , No. 22-cv-012759, Alameda County Superior Court (Mar. 27, 2023)		
41.	Transcript of Deposition of Annamarie Camacho, <i>Valadez v. Johnson & Johnson et al.</i> , No. 22-cv-012759, Alameda County Superior Court (Mar. 2, 2023)		
42.	Valadez - Plaintiff's Letter to ACOR re Dodson Materials (Dodson Reports), sent 2/28/2023		
43.	Declaration of Ronald F. Dodson, <i>In re LTL Management LLC</i> , 21-30589 (MBK), filed 5/24/022		
44.	Valadez Deposition Exhibit 4, photo of bottles		
45.	Weaver & Long article entitled, "Chromogenic Characterization: A Study of Kodak Color Prints, 1942-2008"		
46.	Email from Rivamonte to Roy, with attachments, dated 9/20/2022		
47.	U.S. Census Bureau QuickFacts		
48.	Plaintiff's Opposition to Joint Defendant Johnson & Johnson's Motion in Limine No. 2 to Exclude References to LTL Management LLC's Bankruptcy, filed 4/3/2023, <i>Valadez v. Johnson & Johnson et al.</i> , No. 22-cv-012759, Alameda County Superior Court		
49.	Plaintiff's Notice of Deposition of Defendant Johnson & Johnson's Custodian(s) or Records and Person(s) Most Qualified, filed 3/7/2023, <i>Valadez v. Johnson & Johnson et al.</i> , No. 22-cv-012759, Alameda County Superior Court		
50.	Federica Grosso article entitled, "Pericardial Mesothelioma, a Disease for Brave Hearts"		
51.	Email from Satterley to Brown re: LTL Stay, dated 4/4/2023		
52.	Letter from Kazan, McClain, Satterley & Greenwood objecting to genetic testing, dated 3/14/2023		
Miscellaneous			
53.	Birchfield Deposition Exhibit 003 – Beasley Allen Press Release entitled, "Cancer Victims Uniting to Oppose Johnson & Johnson's Latest Bankruptcy Ploy"		

Ex.	Description	Beg. Bates No.	Confidential ² Designation
54.	Murdica Deposition Exhibit 6 – Reuters Article entitled, “J&J talc unit 2nd bankruptcy must be dismissed, cancer victims’ lawyers say”		
55.	Watts Deposition Exhibit 3 – Watts Guerra LLC Press Release entitled, “Watts Guerra LLC & 12 Other Firms Representing Vast Majority of Johnson & Johnson Talc Claimants, Announce Broad Support for New \$8.9 Billion Settlement with J&J”		
56.	Watts Deposition Exhibit 4 - Slides re Talc Settlement, presented April 12, 2023		
57.	Watts Deposition Exhibit 5 – Still shots of video presentation		
58.	Birchfield Deposition Exhibit 001 - 9/5/2020 Email from Birchfield to Murdica re: **Confidential** with attachment “TALC TERM SHEET (AN-5PM) (9-4-20).docx”		Confidential
59.	Birchfield Deposition Exhibit 002 – Confidential Settlement Term Sheet, dated 9/4/2020 5:20 PM		Confidential
60.	Birchfield Deposition Exhibit 004 – PowerPoint entitled, “Value of Ovarian Cancer Claims”		Confidential
61.	Birchfield Deposition Exhibit 005 – Beasley Allen webpage entitled, “Talcum Powder Verdicts”		
62.	Birchfield Deposition Exhibit 006 – Beasley Allen webpage entitled, “Talcum Powder”		
63.	Birchfield Deposition Exhibit 007 – Results NeoTYPE Analysis Discovery Profile for Debra Henry, dated 5/4/2020		Confidential
64.	Birchfield Deposition Exhibit 008 – Medical Report of Susan Vogeler, dated 4/24/2018		Confidential
65.	Birchfield Deposition Exhibit 009 – National Cancer Institute webpage entitled, “Ovarian, Fallopian Tube, and Primary Peritoneal Cancers Prevention (PDQ) – Health Professional Version”		
66.	My Cancer Genome, Malignant Mesothelioma webpage		
67.	Excerpts from 8/20/2020 Sylvester Reyes Deposition Transcript		
68.	Molton Deposition Exhibit 0001 – Email chain between Greg Gordon and David Molton re: LTL		Confidential
69.	Watts Deposition Exhibit 6 – Email from Watts to Murdica and Itkin re: RSA-Talc with an attachment entitled, “RESTRUCTURING		Confidential

Ex.	Description	Beg. Bates No.	Confidential ² Designation
	SUPPORT AGREEMENT-LTL (20230226-MCW).docx”		

Dated: April 19, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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